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June 9, 2011 (PBW Project No. 1651-2)

VIA ELECTRONIC MAIL

Mr. Chris Villarreal Remedial Project Manager, 6SF-RA U.S. Environmental Protection Agency Region 6 1445 Ross Avenue Dallas, Texas 75202

Re: Bi-Monthly Progress Report, R&H Oil/Tropicana Energy Site, San Antonio, Texas

Dear Mr. Villarreal:

Pursuant to Section IX, Paragraph 37 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this bi-monthly progress report on behalf of the Respondents named in the Settlement Agreement. In accordance with the Settlement Agreement requirements, this progress report addresses the topics listed below:

- 1. Actions which have been taken to comply with the Settlement Agreement during the preceding two-month period The following actions were taken during the previous two-month period:
 - A meeting between PBW, the Texas Commission on Environmental Quality (TCEQ), and EPA was conducted on April 13, 2011 to discuss potential changes to the investigation based on data obtained during the off-site well installation.
 - On April 25, 2011, a Work Plan Refinement/Modification Notice was prepared to document the changes agreed to in the April 13 meeting.
 - Notification of field work involving the installation and sampling of on-site monitoring wells was provided to you on May 5, 2011.
 - During the week of May 23, 2011, soil samples were collected at 14 soil boring locations, and 14 monitoring wells were installed on the Site at the locations proposed in the RI/FS Work Plan. Well installations were completed, the wells were developed, and groundwater sampling was begun the week of May 30, 2011, with groundwater sampling completed the week of June 6, 2011.
 - The newly installed monitoring wells, existing on-site monitoring wells, and repaired existing monitoring wells were surveyed for horizontal and vertical coordinates on June 2, 2011 by Doyle and Wachtstetter Surveyors.

- A Right of Entry agreement between PBW and Union Pacific Railroad (UPRR) was obtained to provide access to the drainage ditch west of the Site (pursuant to Settlement Agreement Paragraph 52).
- Notice of Completion of Field Support Activities was provided to you on May 31, 2011.
- 2. Quality-assured results of sampling, tests and all other quality-assured data received by Respondents during the preceding two-month period No quality-assured data were received during the preceding two-month period:
- 3. Work planned for next two months with schedules relating such Work to the overall project schedule for RI/FS completion The following work is planned for the next two months:
 - Laboratory analyses of the soil, groundwater, and non-aqueous phase liquid (NAPL) collected from the on-site monitoring wells.
 - Validation of analytical data obtained during the most recent sampling activities.
 - Perform aquifer test activities (slug testing, NAPL baildown testing) as appropriate.
 - Evaluation of the data, and refinement of the Conceptual Site Model, to evaluate potential data gaps.
 - Planning and execution of the next phase of field work, anticipated to include the soil vapor investigation, a second round of groundwater monitoring (on-site and off-site wells), and collection of surface water samples from the adjacent drainage ditch if sufficient water is present.

The planned schedule for this work is generally consistent with the overall RI/FS schedule provided in the approved RI/FS Work Plan.

4. Problems encountered, anticipated problems, actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays – No problems or delays were encountered or anticipated during the preceding two-month period.

In addition to the activities described above, a Site mowing and clearing event was conducted the week of May 16, 2011.

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Thank you for the opportunity to submit this progress report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

For Eric F. Pastor P.E.

Principal Engineer

Tim Nickels
Project Scientist

cc: Marilyn Long – Texas Commission on Environmental Quality (TCEQ)

Taryn Scholz – Quality Assurance Associates, Inc.

Leslie Alexander - de maximis, inc.

Elizabeth Hurst – Structural Metals, Inc.

Lee Bishop – Exxon Mobil Corporation

Heidi Hughes Bumpers – Jones Day

Heather Corken - Fulbright & Jaworski, LLP

David Currier - Flint Group Incorporated

Gary Elkin – BAE Systems Resolution, Inc.

Jack Healy - Perkin Elmer Automotive Research, Inc.

Larry King - Flint Group Incorporated

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James Morriss, III - Thompson & Knight, LLP

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Dave Roberson - de maximis, inc.

Mary Smith - Office of the Attorney General of Texas

Michelle Teed – Office of the Attorney General of Texas

Robert Sterrett – Itasca Denver, Inc.

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Elizabeth Webb - Thompson & Knight, LLP